

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE, PLAINTIFF,
vs. KENNETH D. KYLER, et al., DEFENDANTS.

JUN 27 2001
FILED
HARRISBURG

MARIE D'ANDREA, CLERK
Defendant Per DEPUTY CLERK

copy
126
Judge Rambo
Magistrate Judge Sm

MOTION TO COMPEL DISCOVERY

The Plaintiff John Richard Jae moves this Court pursuant to Rules 33(b)(4) & (5), 34(b) & 37(b), Fed. R. Crim. P., for an order compelling the defendants to answer in full, Interrogatory No. 18 of Plaintiff's Second Set of Interrogatories and to produce for inspection and copying the documents in the Plaintiff's Third Request for Production of Documents (Appl. 22, 2.00), herein in this case:

This Motion is based upon the papers and files in this case and upon the Plaintiff's accompanying Memorandum in Support of Motion to Compel Discovery and Exhibits attached thereto, submitted herewith.

RESPECTFULLY SUBMITTED

(S) — MR. JOHN RICHARD JAE,

#BQ-3219
SCI-Greene/SMU
175 Progress Drive
Waynesburg, PA 15370

Dated: 21st JUNE 2001

Plaintiff and Pro Se Cdu

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JUDGE'S COPY

JOHN RICHARD JAE
Plaintiff

VS.

KENNETH D. KYLER, et al.,
Defendants.

Civil No. 1:00-cv-

FILED

HARRISBURG, PA

JUN 27 2001

MARY E. D'ANUCA, CLERK
Per _____

PLAINTIFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

Plaintiff John Richard Jae, pursuant to Rule 34(b), Fed.R.Civ.P.,
has made Request for Production of Documents hereto attached.
Requesting, and Requests that the produce all of the Documents
listed, herein, below & Infy, within thirty (30) day of receipt of this
Listed, herein, below & Infy, within thirty (30) day of receipt of this
by providing the Plaintiff with entire copies of the documents
or by producing all of such for Plaintiff's inspection and copy.

1. Any and All Request from Captain by Plaintiff re:

Defendant Kyler and/or Paul Karpch, during the months of
and December, 1999, about the dental of his own personal /
religious materials, showers and outside exercise in the
about excessive heat/overventilation problems in the RH
about the Plexiglass shield being placed over the Plaintiff.

Dor.

2. Any and All letters which the Plaintiff wrote to

Deputy Secretary of Corrections Beard and/or Deputy
Deputy Secretary of Corrections (William Love) concerning the dental of
Corrections (William Love) concerning the dental of
personal law books & Religious Materials, showers and
exercise in the SCI Camp Hill RH Unit and/or about excessive
about the Plexiglass shield being placed over the Plaintiff.

1999; and the written responses to this inmateplaintiff on such letters.

3. A copy of each of the DC-141 PART III 30 DAYER PRC REVIEW Papers on this Plaintiff for the months of December 1999, and January, February, March, April & May, 2000.

4. An entire Copy of the SCI-Camp Hill General Rules Regulations FOR RHU as put out by defendant Deputy Superintendent Facilities Management Blatovich in either August or September.

5. A copy of any and all work orders that was turned the RHU concerning any and all problems with the heating system during the months of November & December, 1999.

SUBMITTED BY:

(S) - John Richard JAS
MR. JOHN RICHARD JAS
BQ-3819
SCI-Greenhaven
175 Agness Drive
Waynesburg, PA 15370

Dated: 22nd APRIL 2001:

U.S. vs. Kyler, et al.,
CIVIL No. 1-CH-00-0315
CERTIFICATE OF SERVICE

I certify under the penalty of perjury that on 6/22/01, I mailed to the person listed below, a true & correct carbon copy of each Plaintiff's Motion To Compel Discovery, Brief In Support Of Motion To Compel Discovery, Amended Motion For Stay And Amended Opp'n To Support [REDACTED] AND [REDACTED] Brief In Reply To Defendants' Memorandum Of Opposition To Plaintiff's Motion To Correspond With Another Inmate by U.S. 1st Class Mail, Postage prepaid & addressed to:

MR. Michael L. Harvey, SDAAG,
OFFICE OF THE ATTORNEY GENERAL OF PENNSYLVANIA
15TH FLOOR-STRAWBERRY SQUARE
HARRISBURG, PA 17120

I certify under the penalty of perjury that on 6/22/01 I delivered to prison officials here for mailing to this Court, the originals of each above-named documents.

This Certificate of Service is made pursuant to Under 28 U.S.C.

Dated/Executed on:
22nd JUNE 2001
At: Waynesburg, Pennsylvania

(S)

John Richard G
MR. JOHN RICHARD
#BO-3219
SCI-Greene KMO
175 Progress Drive
Waynesburg, PA 15370
Plaintiff and Pro Se C